

Exhibit EAS-9

DESC Response to Staff 2-26, Docket No. 2019-226-E (2020 IRP)

**DOMINION ENERGY SOUTH CAROLINA, INC.
OFFICE OF REGULATORY STAFF'S SECOND AND CONTINUING REQUEST
FOR PRODUCTION OF BOOKS, RECORDS, AND OTHER INFORMATION
DOCKET NO. 2019-226-E**

REQUEST NO. 2-26:

See the Company's response to ORS Request 1-17, which states, "In the 2019 proposed rulemaking, EPA proposed significant changes to the rule including new effluent limits and an incentive for early retirement of existing generating units. All eight Resource Plans were impacted by the early retirement of a unit prior to an ELG upgrade or the inclusion of an estimate for ELG costs."

- a) Provide further details about what was meant by "All eight Resource Plans were impacted by the early retirement of a unit prior to an ELG upgrade or the inclusion of an estimate for ELG costs." What early retirement prior to an ELG upgrade occurred and what modeling assumptions were made? If the assumptions differed in the 8 different resource cases, please provide the different assumptions.
- b) What ELG upgrades were assumed and what modeling assumptions were made? If the assumptions differed in the 8 different resource cases, please provide the different assumptions.
- c) In the 8 resource plans modeled. Please identify all PROSYM modeling inputs that were different in the 8 cases associated with environmental modeling assumptions. Provide any workpapers that were used to derive the assumptions.
- d) If all of the environmental modeling assumptions were the same in all 8 cases, how can that study design allow for a reasonable comparison of the cases? In other words, in cases in which coal units retire early, those cases would avoid having to incur environmental upgrade costs, whereas the cases without retirement would incur additional environmental costs such as required by the ELG rule.

RESPONSE NO. 2-26:

- a),b),c) In resource plans RP1, RP2, RP4, RP5, RP6, RP7, it was assumed that capital dollars were spent at Wateree and Williams Stations to install ELG mitigation equipment in 2026. The estimations of capital costs were \$101.7M at Wateree Station for flue-gas desulfurization (FGD) wastewater treatment and \$126.8M at Williams Station for bottom ash transport water treatment and FGD wastewater treatment. In addition, it was assumed that fixed O&M increased \$3.33M/year at Wateree Station and \$4.16M/year at Williams Station beginning in 2026 because of the installed ELG mitigation equipment.

In resource plan RP3 Wateree Station is retired in 2028 and no ELG costs are required at Wateree Station. It was assumed that capital dollars were spent at Williams Stations to install ELG mitigation

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equipment in 2026. The estimations of capital costs were \$126.8M at Williams Station for bottom ash transport water treatment and FGD wastewater treatment. In addition, it was assumed that fixed O&M increased \$4.16M/year at Williams Station beginning in 2026 because of the installed ELG mitigation equipment.

In resource plan RP8 Wateree Station and Williams Station are retired in 2028, and no ELG costs are required at either station.

- c) Work papers for the costs used were provided in Response 1-17 as attachment "Confidential Attachment to Response 1-17.pdf."
- d) The environmental modeling assumptions are not the same for each of the 8 resource plans but they are the same for each of the 8 cases, which evaluate sensitivities within a resource plan.

PERSON RESPONSIBLE: James Neely